

**IN THE U.S. DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

SUSAN THAYER,
Qui Tam Plaintiff/Relator

ON BEHALF OF HERSELF AND
ON BEHALF OF THE U.S. OF AMERICA,

Plaintiffs,

vs.

PLANNED PARENTHOOD OF THE
HEARTLAND, INC. (f/k/a PLANNED
PARENTHOOD OF GREATER IOWA,
INC.),

Defendant.

Case No. 4:11-cv-00129-JAJ-CFB

**DECLARATION OF STANLEY J.
THOMPSON; EXHIBITS 1-2**

DECLARATION OF STANLEY J. THOMPSON

I, Stanley J. Thompson, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an attorney with Davis Brown Koehn Shors & Roberts PC (“Davis Brown”), and I am counsel of record for Planned Parenthood of the Heartland (“PPH”) in the above-captioned matter.

2. Since August 2012, Davis Brown has provided professional services to PPH in this matter. During this time, I have supervised certain aspects of Davis Brown’s representation of PPH in this case.

3. As detailed in the concurrently-filed Declaration of Kristen Rodriguez, PPH prevailed on all claims alleged by Plaintiff-Relator Susan Thayer (“Relator”) in this matter. The Court Clerk entered Judgment in PPH’s favor on May 20, 2020. Dkt. 322.

4. At my direction and under my supervision, there has been a thorough review of Davis Brown’s records relating to the costs incurred by PPH for this litigation. The information

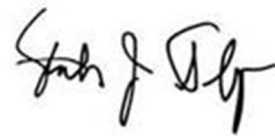
contained in this Declaration has been prepared from that review, and the items herein are true and correct and were actually and necessarily performed. The amount that I have identified as costs recoverable under 28 U.S.C. § 1920 totals \$202.20, as described in more detail below.

5. PPH incurred costs of \$127.20 in witness fees to Pamela Estes, including a \$40.00 attendance fee per 28 U.S.C. § 1821(b), *see* Ex. 1, and \$87.20 in mileage for travel from 509 Center Street, Stanton, Iowa, to 112 N. John Wayne Drive, Winterset, Iowa, a total of 160 miles. *See* Ex. 2. Estes appeared for her deposition on March 8, 2018, and her testimony was relevant to an issue in the case and was reasonably necessary to its resolution. Excerpts of Estes's deposition transcripts were submitted in connection with an event that terminated litigation; specifically, they were appended to: (1) PPH's motion for summary judgment filed May 15, 2018 (Dkt. 225); (2) Relator's motion for summary judgment filed May 15, 2018 (Dkt. 224); and (3) PPH's motion for summary judgment filed December 6, 2019 (Dkt. 300).

6. PPH incurred costs of \$75.00 in pro hac vice filing fees for Cicely Miltich. Dkt. 244.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of June, 2020.



Stanley J. Thompson